

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

SIDNEY JAMES CLAYTON, #224797 )

Plaintiff, )

vs. )

CIVIL ACTION NO. 2:06-CV-367-ID )

J.C. GILES, et.al., )

Defendants. )

**AMENDED AFFIDAVIT**

Before me, the undersigned Notary Public, did personally appear J. C. Giles, who being duly sworn, deposes and presents the following affidavit.

My name is J. C. Giles, and I am an individual over the age of twenty-one years. I am employed with the State of Alabama, Department of Corrections at Ventress Correctional Facility, Clayton, Alabama. I am employed in this capacity as a Warden III. I have read the complaint in the above styled cause and note that inmate Sidney James Clayton, #224797 alleges he never had a breathing problem until he was exposed to something that he has down as initials and in parenthesis that I do not know what stands for. He further alleges that he has



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Affidavit – J. C. Giles

been subjected to second hand smoke by force and it has caused him to develop some kind of condition that is non understandable.

Ventress Correctional Facility has had a "no smoking" in dorms and building policy for several years. There is no smoking allowed in any dorm or building and anyone caught violating are subject to disciplinary action for this violation. All smoking is done outside of dorms and buildings therefore, there would be no forcing of second hand smoke on inmate Clayton or any other inmate. As far as his medical condition, I do not have any medical knowledge and cannot make a determination on Inmate Clayton.

The only other option I would have is to send Inmate Sidney Clayton to Easterling Correctional Facility since it is a "Smoke Free" institution.

Inmate Sidney Clayton, #224797 further alleges that there is a lack of "sprinkler systems" in certain dorms.

Ventress Correctional Facility does have sprinkler systems and is in the process of adding additional sprinkler systems to the new additions.

Ventress Correctional Facility's mission is to confine, manage and provide programs for convicted felons in a safe, secure and humane environment as to provide for positive re-entry of offenders into society.

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The beforementioned facts are true and correct to the best of my knowledge.

J. C. Giles 9-11-06  
Signature Date

STATE OF ALABAMA )

BARBOUR COUNTY )

Sworn to and subscribed before me this 14<sup>th</sup> day of September, 2006.

Reba I Currie  
Notary Public  
My Commission Expires: 9-8-09